

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)
_____)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:)

All Cases)
)
)
)
)

STOPNC DEFENDANTS' NOTICE OF FILING OF MOTIONS

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; and Vaughan Allen, MD (collectively "STOPNC Defendants") hereby give notice that the following were filed into the individual docket for *Tyree v. Ameridose, et al.*, No. 1:13-cv-12479:

1. Tennessee Clinic Defendants' Motion to Dismiss Pursuant to Fed. Rule Civ. P. 37 and Fed. Rule Civ. P. 12(b)(6), filed February 3, 2016.¹
2. Tennessee Clinic Defendants' Memorandum of Law in Support of their Motion to Dismiss Pursuant to Fed. Rule Civ. P. 37 and Fed. Rule Civ. P. 12(b)(6), filed February 3, 2016.²
3. Plaintiff's Response in Opposition to Motion to Dismiss, filed March 3, 2016.³
4. STOPNC Defendants' Motion to Strike Plaintiff's Response in Opposition to Motion to Dismiss, filed March 9, 2016.⁴

¹ Attached as Exhibit 1.

² Attached as Exhibit 2.

³ Attached as Exhibit 3.

The pleadings are fully briefed, and are ripe to be heard at the Court's April 14, 2016 status conference, should the Court desire oral argument.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

C.J. Gideon, Jr.*

Chris J. Tardio*

Alan S. Bean**

Matthew H. Cline*

315 Deaderick Street, Suite 1100

Nashville, TN 37238

Ph: (615) 254-0400

Fax: (515) 254-0459

chris@gideoncooper.com

Attorneys for the STOPNC Defendants

* Admitted pursuant to MDL Order No. 1.

** Admitted *pro hac vice*.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 12th day of April, 2016.

/s/ Chris J. Tardio

⁴ Attached as Exhibit 4.